



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail

Mr. Christopher Cannon
Director of Environmental Management
City of Los Angeles Harbor Department
Environmental Management Division
425 South Palos Verdes Street, San Pedro, CA 90731

Re: Revised Final Removal Action Work Plan for the Former San Pedro Boat Works, Miner Street, Birth 44, San Pedro, California

Dear Mr. Cannon,

Thank you for working with the U.S. Environmental Protection Agency Region 9 to address the cleanup and disposal of polychlorinated biphenyls found at the former San Pedro Boat Works located at Miner Street, Birth 44, San Pedro, California (Site). USEPA has received and reviewed the City of Los Angeles, Harbor Department's March 1, 2017 *Revised Final Removal Action Work Plan* (work plan) prepared by Tetra Tech, Inc. which outlines the Harbor Department's PCB remediation, disposal, and verification plan for soils and concrete on the Site. USEPA is approving the Harbor Department's work plan under 40 CFR 761.61(c) (risk-based disposal approval).

This work plan describes the dig and haul process and subsequent disposal at a Toxic Substance Control Act permitted Facility. The Site is currently zoned as commercial/industrial and is surrounded by water and a large asphalt parking area. The Site was primarily used for refurbishing commercial, private, and government vessels. The facility provided services such as sand blasting, machining, fiberglass work, welding, carpentry, painting, and electrical repairs. The future use of the Site is undetermined; however, the Harbor Department is a landlord for the State of California and under the Tidelands Trust Act, the land can only be used for port-related activities, and not for residential usage. The Site also includes several potentially historical buildings that are in process of being evaluated for their historical significance. The buildings, building foundations, and soils beneath the buildings have not been fully characterized, except the building exterior paint. The Harbor Department is awaiting evaluation of the buildings to determine whether they will be left in place, renovated or demolished. The Harbor Department will coordinate with USEPA to address any potential PCB characterization and subsequent cleanup actions once the building evaluations are complete.

The Site could be used for green space or parks; therefore, the Harbor Department completed a Human Health and Ecological Risk Assessment in September of 2011. Based on the HHERA, the Harbor Department has proposed a cleanup goal of 0.22 ppm (mg/kg) total PCBs with no one sample to exceed 1.1 ppm. The cleanup goals will be verified by calculating the 95% upper confidence level using the USEPA's ProUCL software. The Harbor Department shall implement the work plan as written.

This Approval does not relieve the owner, the City of Los Angeles Harbor Department from complying with all other applicable federal, state, and local regulations and permits. Departure from the conditions of the Approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this Approval, and/or an enforcement action. Nothing in this Approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this Approval.

This approval only applies to the San Pedro Boat Works located at Miner Street, Berth 44, San Pedro, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Site if new information during additional Site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the Site above the approved PCB cleanup level. In addition, USEPA may require cleanup in areas immediately adjacent to the Site if those areas are found to be impacted by PCBs from the Site.

USEPA appreciates the opportunity to assist the City of Los Angeles Harbor Department on the PCB disposal to be conducted at their facility in San Pedro, California. If you have any questions regarding this Approval, please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

Jeff Scott, Director
Land Division

Cc Via Electronic Mail Only

Pauling Sun
PSun@portla.org